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5      Phone: (206) 407-3300

6      **Honorable Salvador Mendoza, Jr.**

7

8      **UNITED STATES DISTRICT COURT FOR THE**  
9      **EASTERN DISTRICT OF WASHINGTON**  
10     **AT SPOKANE**

11     SOUTH HILL MARKET, a Washington  
12     entity; GEDION TEKLEMARIAM  
13     TESFA, an individual and OGBAI  
14     GEBREMICHAEL TESFU, an individual,

15     No. 2:19-cv-00073-SMJ

16     **PLAINTIFF'S WITNESS AND EXHIBIT**  
17     **DISCLOSURES**

18     Plaintiffs,

19     v.

20     UNITED STATES OF AMERICA; and  
21     U.S. DEPARTMENT OF  
22     AGRICULTURE (USDA),

23     Defendants.

24     COMES NOW Plaintiffs, South Hill Market, Gedion Teklemariam Tesfa, and Ogbai  
25     Gebremichael Tesfu, by and through their attorneys of record, Jimmy Garg of Seattle Litigation  
26     Group, PLLC, and make their pretrial witness and exhibit disclosures pursuant to FRCP 26(a)(3)  
27     and the scheduling order issued in this matter on August 2, 2019 as follows:

28     **I. WITNESSES**

29     **A. Witnesses Plaintiffs Expect to Testify at Trial**

30     1.      Alamein Mohamed  
31            13307 E 25<sup>th</sup> Ave  
32            Spokane Valley, WA 99216  
33            (509) 919-7108

1                   Mr. Mohamed is a current or former employee of South Hill Market and is expected to  
2 testify to the sale of EBT eligible items, and other store policies regarding SNAP benefits. No  
3 known time conflicts.

4                   2.       Robel Yohannes  
5                            857 E Lyons Avenue, Unit 25  
6                            Spokane, WA 99208  
7                            (509) 832-5473

8                   Mr. Yohannes is a current or former employee of South Hill Market and is expected to  
9 testify to the sale of EBT eligible items, and other store policies regarding SNAP benefits. No  
10 known time conflicts.

11                   3.       Pal Boles  
12                            207 E Empire Avenue  
13                            Spokane, WA 99208  
14                            (509) 768-0847

15                   Mr. Boles is a current or former employee of South Hill Market and is expected to testify  
16 to the sale of EBT eligible items, and other store policies regarding SNAP benefits. No known  
17 time conflicts.

18                   4.       Jon Dorothy  
19                            2825 Leialoha Place  
20                            Haiku, HI  
21                            (509) 270-9619

22                   Mr. Dorothy is a current or former employee of South Hill Market and is expected to testify  
23 to the sale of EBT eligible items, and other store policies regarding SNAP benefits. No known  
24 time conflicts.

25                   5.       Simon Tesfu  
26                            1691 SW Mulberry Place  
27                            Oak Harbor, WA 98277  
28                            (206) 504-8629

1                   Mr. Tesfu is a current or former employee of South Hill Market and is expected to testify  
2 to the sale of EBT eligible items, and other store policies regarding SNAP benefits. No known  
3 time conflicts.

4                   6.       Gedion Tesfa  
5                           13307 E 25<sup>th</sup> Ave  
6                           Spokane Valley, WA 99216  
7                           (509) 217-3701

8                   Mr. Tesfa is the current owner of South Hill Market and is expected to testify to the sale  
9 of EBT eligible items, and other store policies regarding SNAP benefits. No known time conflicts.

10                  7.       Vicki Parker  
11                           Padgett Business Services  
12                           222 W Mission Ave, Suite 230  
13                           Spokane, WA 99201  
14                           (509) 327-5513

15                  Ms. Parker is the bookkeeper for South Hill Market and is expected to testify to the sale  
16 of EBT eligible items, other store policies regarding SNAP benefits, and the general financial  
17 affairs of South Hill Market. No known time conflicts.

18                  8.       Abdu Abdullahi  
19                           1407 E Hartson Ave, Apt 1  
20                           Spokane, WA 99202  
21                           (509) 227-9044

22                  Mr. Abdullahi frequents South Hill Market and resides in the community around the store.  
23                  He is expected to testify to the importance of South Hill Market to the local Ethiopian community  
24                  in general, and as a store with EBT eligible items. No known time conflicts.

25                  8.       Dangachew Uma  
26                           Habesha Community of Spokane  
27                           17307 E Alki Ave  
28                           Spokane Valley, WA 99016  
29                           (509) 671-2720

1                   Mr. Uma is President of the Habesha Community of Spokane and is expected to testify to  
2 the importance of South Hill Market to the local Ethiopian community in general, and as a store  
3 with EBT eligible items. No known time conflicts.

4                   **Plaintiffs reserve the right to amend and/or supplement this Witness List.**

5                   **II. EXHIBITS**

6                   A. Exhibits Plaintiffs Expect to Offer

- 7                   1.       May 15, 2018 USDA Charge Letter
- 8                   2.       August 31, 2018 USDA Determination Letter
- 9                   3.       USDA Trafficking Charge Determination Report
- 10                  4.       Affidavits from South Hill Market EBT Customers
- 11                  5.       Photos of South Hill Market Inventory
- 12                  6.       November 16, 2010 HistoryLink.org Article, "*Ethopian and Eritrean*  
13                  *Communities in Seattle*"
- 14                  7.       June – September 2018 Receipts of EBT Transactions at South Hill Market
- 15                  8.       Invoices Billed to South Hill Market
- 16                  9.       June 2, 2014 Money.com Article, "*Your Grocery Store May Soon Be Cut*  
17                  *in Half*"
- 18                  10.      South Hill Market Property Size Chart
- 19                  11.      April 9, 2020 Letter from Habesha Community of Spokane

20                  B. Exhibits Plaintiffs May Offer if the Need Arises

- 21                  12.      January 18, 2019 Plaintiff's Request for Administrative Review
- 22                  13.      January 31, 2019 USDA Final Agency Decision

**Plaintiffs reserve the right to supplement and/or amend this Witness and Exhibit List. In addition to the foregoing exhibits, Plaintiffs may utilize the exhibits Defendant has indicated they intend to offer at the time of trial. Plaintiffs may supplement this list as litigation continues.**

DATED this 2<sup>nd</sup> day of July, 2020.

## SEATTLE LITIGATION GROUP, PLLC

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*Attorney for Plaintiffs*

## CERTIFICATE OF SERVICE

I certify under penalty of perjury of the laws of the United States of America and the State of Washington that on the date stated below, I caused the foregoing *PLAINTIFFS' WITNESS AND EXHIBIT DISCLOSURES* to be served on the following parties:

**William D. Hyslop, US Attorney**  
**Derek T. Taylor, Asst. US Attorney**  
U.S. Department of Agriculture  
PO Box 1494  
Spokane, WA 99210-1494  
Email: [derek.taylor@usdoj.gov](mailto:derek.taylor@usdoj.gov)  
*Attorney for Defendants*

- Via Legal Messenger
- Via Facsimile
- Via Electronic Mail
- Via U.S. Mail/Commercial Post
- Via Electronic Filing/Eservice
- Via Hand-Delivery

The foregoing statement is made under the penalty of perjury under the laws of the United States of America and the State of Washington and is true and correct.

DATED this 2nd day of July 2020.

## SEATTLE LITIGATION GROUP, PLLC

/s/ Sean Stevens  
Sean Stevens  
Paralegal